

1 WILLIAM H. SHIBLEY
2 California State Bar No. 56093
3 **LLOYD & MOUSILLI, PLLC**
4 11807 Westheimer Road
5 Suite 550 PMB 944
6 Houston, TX 77077
7 Tel: (512) 609-0059
8 Fax: (281) 783-8565
9 *disputes@lloydmousilli.com*

10 **ATTORNEYS FOR DEFENDANTS**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DISTRICT**

14 **DAVID HOUGH, et al.**

15 *Plaintiffs,*

16 **v.**

17 **RYAN CARROLL, et al.**

18 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

**DECLARATION OF ELIZABETH
REVERE IN SUPPORT OF
JURISDICTIONAL DEFENDANTS'
MOTION TO RELEASE FUNDS**

Hearing: 12/13/24, 1:30 p.m. PT

Action Filed: April 9, 2024
Trial Date: N/A

23
24
25 BEFORE ME, the undersigned authority, on this day personally appeared
26 **Elizabeth Revere**, and being duly sworn upon his oath by me, deposed and stated
27 as follows:

28 1. "My name is **Elizabeth Revere**. I am over eighteen (18) years of age, and I
have never been convicted of a crime. I am of sound mind and capable of making

1 this Declaration. The facts set forth herein are based on my personal knowledge and
2 are true and correct. I am competent to testify to the facts herein.

3 2. I submit this declaration in connection with and in support of Jurisdictional
4 Defendants' Motion to Release Funds.

5 3. I am Senior Counsel with Lloyd & Mousilli ("L&M") and am licensed to
6 practice law in both Texas and Louisiana. As part of my role at L&M, I handle
7 litigation in both state and federal court and I also oversee, manage, and co-ordinate
8 client cases in jurisdictions where there is local counsel. In that capacity, I have
coordinated with local counsel in this case and I have dealt with related cases in
Texas and Florida.

9 4. On September 27, 2024, I participated in a telephone conference with
10 Plaintiffs' counsel, Nico Banks ("Mr. Banks"). During this discussion, the Motion
11 to Release Funds ("Motion") and whether Plaintiffs would oppose the Motion were
12 addressed. Mr. Banks indicated that he would confer with counsel and Plaintiffs
before providing a final position.

13 5. Later that same day, Mr. Banks sent emailed to confirm that Plaintiffs oppose
14 the Motion *See Exhibit A*, Sept. 27, 2024 Correspondence.

15 I declare under the laws of the State of Texas that the foregoing is true and
16 correct.

17 FURTHER AFFIANT SAYETH NOT.

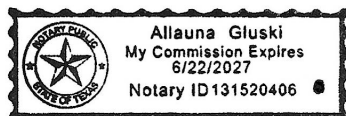
18 

19 ELIZABETH REVERE

20
21 STATE OF TEXAS }
22 COUNTY OF HARRIS }

23 SUBSCRIBED AND SWORN TO BEFORE ME on 8th day of November.
24

25 



Print Name: Allauna Gluski
Notary Public in and for the State of Texas
My Commission expires on June 22, 2027

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service in this court on this ***November 8, 2024***, via email as follows:

/s/ William Shibley
William Shibley